From:	MCCLINCY Matt
To:	Kristine Koch/R10/USEPA/US@EPA
Cc:	ROICK Tom; Sean Sheldrake/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; Eric Blischke/R10/USEPA/US@EPA; ANDERSON Jim M
Subject:	RE: Rhone Poulenc
Date:	07/11/2007 04:09 PM

Kristine,

DEQ met with Rhone Poulenc (SLLI) yesterday. This was a pre-scheduled project meeting to discuss the status of interim source control measures. The following are highlights.

Lake Area Pilot - SLLI's field pilot in the lake area showed that facilitating aerobic bioremediation was not effective. I will not go into the details here. They are in the process of conducting bench scale tests on aquifer material for in-situ chemical oxidation.

North Front Avenue Interim Source Control Measure (NFA ISCM) - SLLI had planned on implementing a full-scale bioremediation program for the NFA ISCM if the Lake Area Pilot worked out. Since it did not, SLLI is currently proposing an in-situ chemical oxidation program to treat contaminants (i.e., VOCs) migrating in the "gravel" channel which is currently believed to be transporting the main groundwater flux to the river. SLLI distributed copies of a NFA ISCM workplan at the meeting. I will forward a hard copy to EPA Portland and a hard copy and CD to your attention (SLLI gave us a number of xtra hard copies).

DEQ will be providing review comments on the draft NFA ISCM workplan within 30 days. As this is an interim remedial measure and not the final proposed source control program for SLLI DEQ views EPA review and comment as optional. However, both SLLI and DEQ would welcome EPA's review. SLLI wants to implement the NFA ISCM as soon as possible. They believe that if effective it can result in clean ground water within the gravel zone at the riverbank within 2 to 4 years.

SLLI Source Control Program - The current schedule requires a complete source control evaluation for all pathways by Dec. 2007 followed by an alternatives evaluation in 2008. The alternatives evaluation will evaluate the effectiveness of the NFA ISCM and incorporate it as appropriate into the final source control strategy.

Dioxin - Evaluation of dioxin as a groundwater contaminant is and has been an element of the groundwater characterization as well as evaluation of potential transport mechanisms (e.g., colloidal studies). Recently, SLLI agreed to provide a data evaluation and recommendations to EPA regarding the presence of a dioxin groundwater plume as part of the in-water RI data gaps evaluation. At the meeting SLLI informed DEQ that a review of their dioxin data found that 68% of the laboratory method blanks contained detections below the ML (minimum detection level). For example the ML for 2,3,7,8 TCDD is 10 picograms/L. Detections below the ML do not require remedial efforts by the lab. However, these detections exceed Pdx Harbor screening levels values. SLLI's point is that the detections in groundwater that they see away from dioxin source areas (e.g., herbicide production area upland) may well be the result of random laboratory error or false positives given that these detections are at the limits of the lab methodology. AMEC, the consultant for SLLI is putting together a tech memo on this (time frame uncertain).

Arkema - I walked SLLI through EPA's expectations for groundwater source control at the Arkema facility.

* Given the expanded potential Arkema early action study area, EPA expects that all groundwater exceeding JSCS SLVs at the Arkema riverbank will be controlled prior to implementation of the in-water action.
* EPA is not applying the JSCS to upland source control at the Arkema site. They are using the JSCS SLVs as preliminary remedial action objectives to determine compliance with the remedial action objectives specified in the EPA/Arkema Early Action Order.
* EPA is currently drafting a letter to SLLI articulating its expectations for groundwater source control on Lots 1 and 2.
* I explained that DEQ expected that SLLI will need to accelerate their source control program for the portion of the RPAC plume that crosses Lots 1 and 2 in order to meet the EPA early action schedule.

EPA - Overall SLLI groundwater source control program - I conveyed to SLLI that DEQ has received informal/indirect communication from EPA that they do not believe that the SLLI groundwater source control program is on track or aggressive enough. This was conveyed in the context of the need to support a possible in-water early sediment action to address Gasco/Siltronic/SLLI sediment impacts. DEQ explained that it is not clear to DEQ that the existing SLLI source control program is not compatible with the envisioned additional EPA early action. However, DEQ and EPA are scheduling a meeting to review the SLLI groundwater source control program which may result in changes to the source control strategy and schedule. The SLLI letter that EPA is preparing may speak to this issue.

SLLI very much wants to continue an open dialog with EPA regarding source control expectations and offered to again meet with EPA to review their source control program and NFA ISCM. DEQ felt that this would be a good idea, but only after DEQ has had an opportunity to meet with EPA and review the SLLI source control program.

Matt McClincy
Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Ave., Suite 400
Portland, Oregon 97201-4987
Phone 503-229-5538
Fax 503-229-6945